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*Attorneys for Defendants*

NGAN VAN LE, INDIVIDUALLY AND AS  
 TRUSTEE FOR THE AD VITAM AUT  
 CULPAM TRUST; JML HOLDINGS, LLC,  
 AND JML SURGICAL CENTER LLC

UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

JOCELYNE R. UY, an individual; and  
 WESTLEY U. VILLANUEVA, an individual,

Plaintiffs,

vs.

SANDY VAN, an individual; NGAN VAN LE,  
 an individual; SANDY VAN, LLC dba VAN  
 LAW FIRM, a Nevada Domestic Limited  
 Liability Company; VAN AND ASSOCIATES  
 LAW FIRM, PLLC, a Nevada Professional  
 Limited Liability Company; JML HOLDINGS,  
 LLC, a Nevada Domestic Limited-Liability  
 Company; NGAN VAN LE as Trustee for the AD  
 VITAM AUT CULPAM TRUST; JML  
 SURGICAL CENTER, LLC, a Nevada Domestic  
 Limited-Liability Company; DOES I through X;  
 and ROE CORPORATIONS 1 through X,  
 inclusive,

Defendants.

Case No. 2:24-cv-00599-GMN-DJA

**STIPULATION AND ORDER  
 EXTENDING DEADLINE FOR REPLY  
 TO RESPONSE TO LE DEFENDANTS'  
 MOTION TO DISMISS**

**(FIRST REQUEST)**

Defendants, Sandy Van, Sandy Van, LLC dba Van Law Firm, and Van and Associates Law  
 Firm, PLLC (collectively, the "Van Defendants"), by and through their counsel; Defendants, Ngan  
 Van Le, JML Holdings, LLC, Ad Vitam Aut Culpam Trust, and JML Surgical Center, LLC

(collectively, the “Le Defendants”), by and through their counsel; and Plaintiffs, Jocelyne R. Uy and Westley U. Villanueva (collectively, “Plaintiffs”), by and through their counsel, hereby stipulate and agree as follows:

1. On April 17, 2024, the Le Defendants filed a Motion to Dismiss the First Amended Complaint [ECF No. 12] (the “Le 12(b)(6) Motion”);

2. On May 1, 2024, Plaintiffs filed a Response [ECF No. 19] to the Le 12(b)(6) Motion;

3. The Le Defendants presently have until May 8, 2024, to file a Reply to the Response to the Le 12(b)(6) Motion;

4. Due to work-related scheduling conflicts for the Le Defendants’ counsel, including a Fed. R. Civ. P. 12(b)(6) motion to dismiss in a RICO case, a confidential mediation statement in another RICO case, a petition for rehearing in an appeal pending before the Nevada Supreme Court, and extensive written discovery and supplemental disclosure obligations in two state court cases, and based on the number of arguments to be addressed by the Le Defendants in their Reply to Plaintiffs’ Response to the Le 12(b)(6) Motion, and as a matter of professional courtesy extended by Plaintiffs’ counsel, the Le Defendants shall have until May 17, 2024 to file a Reply to the Response to the Le 12(b)(6) Motion; and

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5. This is the first request to extend the deadline for filing the Reply to the Response to the Le 12(b)(6) Motion and is made in good faith and not for purposes of delay.

Dated this 7<sup>th</sup> day of May, 2024.

Dated this 7<sup>th</sup> day of May, 2024.

BAILEY ♦ KENNEDY

JEPSEN LAW, PLLC

By: /s/ Joshua P. Gilmore

By: /s/ Kendra Jepsen

DENNIS L. KENNEDY

KENDRA JEPSEN (Bar No. 14065)

JOSHUA P. GILMORE

- and -

TAYLER D. BINGHAM

*Attorneys for Defendants,*  
NGAN VAN LE, INDIVIDUALLY AND AS  
TRUSTEE FOR THE AD VITAM AUT  
CULPAM TRUST; JML HOLDINGS, LLC,  
AND JML SURGICAL CENTER LLC

SILVIA U. VILLANUEVA (Bar No. 13608)  
ADLER & VILLANUEVA, LLC

*Attorneys for Plaintiffs,*  
JOCELYN R. UY AND WESTLEY U.  
VILLANUEVA

Dated this 7<sup>th</sup> day of May, 2024.

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

By: /s/ Sheri M. Thome

SHERI M. THOME (Bar No. 8657)

NICHOLAS F. ADAMS (Bar No. 14813)

*Attorneys for Defendants,*  
SANDY VAN, SANDY VAN, LLC DBA  
VAN LAW FIRM, AND VAN AND  
ASSOCIATES LAW FIRM, PLLC

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

Dated: May 8, 2024